

COFFEY | BURLINGTON
ATTORNEYS AT LAW

KENDALL COFFEY

May 11, 2021

kcoffey@coffeyburlington.com

Via CM/ECF

2601 South Bayshore Drive, Penthouse
Miami, Florida 33133
T.305.858.2900 F.305.858.5261
www.coffeyburlington.com

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

RE: *United States v. Kozel*, Case No. 19-cr-460-KMW
Motion for one-week extension of time

Dear Judge Wood:

We write on behalf of Defendant Todd Kozel seeking a one-week extension of time to file the Defendant's Sentencing Memorandum, currently due on May 11, 2021.

On May 4, 2021, the Court postponed Mr. Kozel's sentencing by one week, from May 25, 2021 to June 1, 2021, due to a scheduling conflict on the Court's calendar. (ECF No. 81.) Given the one-week postponement, the Defendant seeks an additional week to file his Sentencing Memorandum, up to and including May 18, 2021. The Government would also request a one-week extension of their submission deadline to May 25, 2021.

Assistant United States Attorneys Louis Pellegrino and Olga Zverovich consent to the one-week extension requested herein for both the Defendant's and Government's submissions.

We ask that you endorse this letter confirming the extension of time.

Respectfully submitted,

/s/Kendall B. Coffey

Kendall B. Coffey
Counsel for Todd Kozel

cc: Louis Pellegrino, AUSA
Olga Zverovich, AUSA